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April 27, 2022

Judge Kaplan
US Bankruptcy Court
Clarkson S. Fisher US Courthouse
402 East State Street
Trenton, NJ 08608

Re: Eliezer Mordan, 22-10573, Motion to Expunge Claim

Dear Judge Kaplan:

The creditor Kyle Wilson objects to the motion to expunge the claim. This is the debtor's third chapter 13 filing. She filed in 2016, Case 16-23218, 2018, Case 18-29760, and in 2022, Case 22-10572.

Any statute of limitations for Mr. Kyle Wilson to pursue his rights under his promissory note should be equitably tolled. He could not pursue his legal rights to pursue collection on this note, because of the numerous bad faith filings by the debtor.

In summary, the motion to expunge should be denied by the repetitive and bad faith filings by the debtor. She is a serial filer. The creditor could not pursue his legal rights but for the many filings by the debtor. In summary, please deny the motion to expunge the creditor's claim. He lent money to the debtor to purchase a home. The debtor earns reasonable income, and she is a physician. She should be court ordered to repay a portion of this debtor thru a chapter 13 plan. Thank you for your consideration.

Very truly yours,

/s/ Theodore Sliwinski, Esq.

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